

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States of America,

Court File No. 22-224(8) (NEB/TNL)

Plaintiff,

v.

MOTION TO TRAVEL

Yusuf Bashir Ali,

Defendant.

Defendant Yusuf Bashir Ali respectfully moves the Court for an order allowing him to travel to Dubai, UAE, and Nairobi, Kenya, to visit his Uncle Saiid Hassan who is suffering from terminal cancer and likely does not have long to live. Mr. Hassan was a surrogate father to Mr. Ali and raised Mr. Ali while Mr. Ali's biological father was either imprisoned or fleeing political prosecution as a high-ranking member of the opposition movement in Somalia.

Mr. Ali plans to join Mr. Hassan for cancer-therapy sessions scheduled from mid-December to mid-January in Dubai, after which he would accompany Mr. Hassan back to his home in Nairobi, where he would stay with Mr. Hassan for two weeks before returning to the United States on January 31, 2024. Specifically, Mr. Ali will depart MSP at 9:10 p.m. on December 10, transferring planes in Amsterdam, and arriving in Dubai at 12:05 a.m. on December 12. While in Dubai, Mr. Ali will stay at the residence of his cousin Omar Ali Hassan. Mr. Ali's return flight from Nairobi is scheduled to leave at 11:59 p.m.

on January 30, 2024, again transferring planes in Amsterdam, and arriving back at MSP at 1:00 p.m. on January 31, 2024. Mr. Ali's specific proposed itinerary is attached as Exhibit A to this Motion.

Mr. Ali is not a flight risk. He is a U.S. citizen, and his wife and minor children will remain in Minnesota while he travels to see Mr. Hassan. Mr. Ali has pleaded guilty, participated in his PSR interview, and provided the financial information requested by the government pursuant to his plea. He has been compliant while on supervised release and made all court appearances. Mr. Ali will maintain regular contact with the undersigned while he is traveling and will notify the undersigned as soon as he arrives in Nairobi from Dubai.

Defense counsel has conferred with the government, and it takes no position on this request. Defense counsel has also conferred with probation, and they likewise take no position.

For the above-stated reasons, Defendant respectfully requests that the Court grant him permission to travel to Dubai, UAE on December 10, 2023, returning to Minneapolis from Nairobi, Kenya on January 31, 2024.

Respectfully Submitted

Dated: December 4, 2023

/s/ Kevin C. Riach

Kevin C. Riach (#0389277)

125 Main St. SE, Suite 339

Minneapolis, MN 55412

Telephone: 612.203.8555

kevin@riachdefense.com

ATTORNEY FOR DEFENDANT